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Counsel for Defendant Jeffry HILL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

No. 16-CR-454 RS

Plaintiff,

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE STATUS
CONFERENCE**

V.

JEFFRY HILL,

Defendant.

I. STIPULATION

The parties in this case agree and jointly request the Court to move the status conference scheduled in the above captioned case from December 13, 2016 to January 17, 2017 at 2:30 p.m. The reason for this request is that defense counsel requires additional time to review discovery, which to date includes over 17,000 pages of accounting records, over 10,000 pages of other paper discovery, and audio recordings and electronic device data.

The parties concur that granting the exclusion would allow the reasonable time necessary for effective preparation of counsel and continuity of counsel. *See* 18 U.S.C. §

1 3161(h)(7)(B)(iv). The parties also agree that the ends of justice served by granting such an
2 exclusion of time for the purposes of effective preparation of counsel outweigh the best interest
3 of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

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5 DATED: December 12, 2016 _____/s/
6 BENJAMIN KINGSLEY
7 Assistant United States Attorney

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9 DATED: December 12, 2016 _____/s/
10 GALIA AMRAM
11 Attorney for Defendant Jeffry Hill

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13 [PROPOSED] ORDER

14 For the reasons stated above the Court hereby CONTINUES the status hearing in the
15 aforementioned case from December 12, 2016 to January 17, 2017. The Court further finds that
16 the exclusion from the time limits of this period applicable under 18 U.S.C. § 3161 is warranted
17 and that the ends of justice served by the continuance outweigh the best interests of the public
18 and the defendant in a speedy trial. Denying the requested exclusion of time would deprive the
19 defendant effective preparation of counsel, taking into account the exercise of due diligence. 18
20 U.S.C. § 3161(h)(7)(B)(iv).

21 IT IS SO ORDERED.

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23 DATED: 12/12/16

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THE HONORABLE RICHARD SEEBOORG
United States District Judge